



May 17, 2024

**VIA ECF**

Honorable Brian R. Martinotti, U.S.D.J.  
United States District Court  
District of New Jersey  
U.S. Post Office & Courthouse  
2 Federal Square  
Newark, NJ 07102

**Re: *In re: Insulin Pricing Litigation*, No. 2:23-md-03080-BRM-RLS,  
MDL No. 3080**

Dear Judge Martinotti:

Pursuant to CMO #5, the parties provide the following status update for the weeks of May 6 and May 13:

1. **Prior Productions.** On Tuesday, May 14, 2024, following the case management conference, Plaintiffs contacted Defendants seeking the date by which they could expect to receive the production of documents that have been previously produced by Defendants in cases now centralized in/coordinated with this MDL. Plaintiffs followed up with Defendants regarding this request on Thursday, May 16, 2024. Defendants are working on those productions and will be in touch with Plaintiffs on their timing in the near term.
2. **Plaintiff Fact Sheets.** The parties scheduled a time to meet and confer regarding Plaintiff Fact Sheets, as directed by Judge Singh during the parties' May 13, 2024 conference.
3. **TPP Class Track.** Plaintiffs in the Third-Party Payer Class Track discussed with Defendants a proposal to amend CMO #3.

We thank the Court for its continuing attention to this matter.

Respectfully submitted,

/s/ James E. Cecchi  
James E. Cecchi  
*Liaison Counsel for  
Third-Party Payer Class Track*

/s/ David R. Buchanan  
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*Liaison Counsel for  
Self-Funded Payer Track*

Hon. Brian R. Martinotti, U.S.D.J.

May 17, 2024

Page 2

/s/ Joanne Cicala

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*Liaison Counsel for*

*State Attorney General Track*

/s/ John D. Tortorella

John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (*via* ECF)  
Counsel of Record (*via* ECF)